

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v-

MICHAEL CHU,

a/k/a "Michael Choi,"

a/k/a "Schuching M. Chu,"

a/k/a "Shu Ching Chu,"

a/k/a "Michael Shuching Chu,"

GRACE QUEZON

a/k/a "Charmaine Dabao,"

TROY KING,

ROBIN HUFF,

HSI FENG LI,

a/k/a "The General,"

a/k/a "Xue Feng Li,"

CHI ON WONG,

a/k/a "Tommy Wong,"

MAN WAI CHENG,

a/k/a "Man Wei Chen,"

a/k/a "Tina Wong,"

WING KI LEE,

a/k/a "Joe,"

DICK ONG,

YEE KHIONG TING,

a/k/a "Mr. Ding,"

a/k/a "Paul Ding," and

SHAOFENG SHI,

a/k/a "Simon CP,"

Defendants.

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GOVERNMENT'S FORFEITURE  
BILL OF PARTICULARS

07 Cr. 1143 (DC)

Pursuant to United States v. Grammatikos, 633 F.2d

1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that: (i) the statutory basis for forfeiture includes Title 18, United States Code, Section 982, in addition to the statutes enumerated in the Indictment; and (ii) the property subject to forfeiture as a result of the offenses described in

the Indictment, as alleged in the Forfeiture Allegation, includes but is not limited to the following:

\$7,886.00 in United States currency seized from KT Express on or about December 5, 2007,

\$7,025.00 in money orders seized from KT Express on or about December 5, 2007,

\$10,000.00 in United States currency seized from Wing Ki Lee on or about December 5, 2007, and

\$500.00 money order seized from Wing Ki Lee on or about December 5, 2007.

The Forfeiture Allegations now read as follows:

FORFEITURE ALLEGATIONS

1. As the result of committing the smuggling and counterfeiting offenses in violation of Title 18, United States Code, Sections 371, 545, and 2320, as charged in Counts One, Two, and Three of the Indictment, MICHAEL CHU, a/k/a "Michael Choi," a/k/a "Schuching M. Chu," a/k/a "Shu Ching Chu," a/k/a "Michael Shuching Chu," GRACE QUEZON, a/k/a "Charmaine Dabao," TROY KING, ROBIN HUFF, HSI FENG LI, a/k/a "The General," a/k/a "Xue Feng Li", CHI ON WONG, a/k/a "Tommy Wong," MAN WAI CHENG, a/k/a "Man Wei Chen," a/k/a "Tina Wong," WING KI LEE, a/k/a "Joe," DICK ONG, YEE KHIONG TING, a/k/a "Mr. Ding," a/k/a "Paul Ding," and SHAOFENG SHI, a/k/a "Simon CP," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the

commission of the offenses, including but not limited to at least approximately \$95 million in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the smuggling and counterfeiting offenses charged in Counts One, Two and Three of this Indictment, and including but not limited to the following:

- i. \$7,886.00 in United States currency seized from KT Express on or about December 5, 2007,
- ii. \$7,025.00 in money orders seized from KT Express on or about December 5, 2007,
- iii. \$10,000.00 in United States currency seized from Wing Ki Lee on or about December 5, 2007,
- iv. \$500.00 money order seized from Wing Ki Lee on or about December 5, 2007,

2. As the result of committing the counterfeiting offense in violation of Title 18, United States Code, Sections 2320 and 2, as charged in Count Three of the Indictment, MICHAEL CHU, a/k/a "Michael Choi," a/k/a "Schuching M. Chu," a/k/a "Shu Ching Chu," a/k/a "Michael Shuching Chu," GRACE QUEZON, a/k/a "Charmaine Dabao," TROY KING, ROBIN HUFF, HSI FENG LI, a/k/a "The General," a/k/a "Xue Feng Li", CHI ON WONG, a/k/a "Tommy Wong," MAN WAI CHENG, a/k/a "Man Wei Chen," a/k/a "Tina Wong," WING KI LEE, a/k/a "Joe," DICK ONG, YEE KHIONG TING, a/k/a "Mr. Ding," a/k/a "Paul Ding," and SHAOFENG SHI, a/k/a "Simon CP," the defendants, shall forfeit to the United States, pursuant to Title

18, United States Code, Sections 2320(b)(1)(A) & (B) and 2320(b)(3)(A):

a. Any article bearing or consisting of a counterfeit mark used in committing a violation of Title 18, United States Code, Section 2320(a);

b. Any property used, in any manner or part, to commit or to facilitate the commission of a violation of Title 18, United States Code, Section 2320(a), including but not limited to:

i. One 1998 Volvo Tractor Truck, bearing Vehicle Identification Number 4V47DBGH1WN726668; and

ii. One 1999 Freightliner Truck, bearing Vehicle Identification Number 1FUYYDCYB8XLA42788A;

c. Any property constituting or derived from any proceeds the defendants obtained, directly or indirectly, as the result of the offense, including but not limited to at least approximately \$95 million in United States currency, in that such sum in aggregate is property representing the amount of proceeds the defendants obtained as a result of the counterfeiting offense charged in Count Three of this Indictment, and including but not limited to the following:

i. \$7,886.00 in United States currency seized from KT Express on or about December 5, 2007,

- ii. \$7,025.00 in money orders seized from KT Express on or about December 5, 2007,
- iii. \$10,000.00 in United States currency seized from Wing Ki Lee on or about December 5, 2007, and
- iv. \$500.00 money order seized from Wing Ki Lee on or about December 5, 2007.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value;
- or
- e. has been commingled with other property which cannot be subdivided without difficulty;
- it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any


other property of said defendants up to the value of the above  
forfeitable property.

(Title 18, United States Code, Sections 981, 982 and 2320, Title  
21, United States Code, Section 853(p), and Title 28, United  
States Code, Section 2461.)

Dated: New York, New York  
May 28, 2008

Respectfully Submitted,

MICHAEL J. GARCIA  
United States Attorney

By:   
LEE RENZIN  
Assistant United States Attorney  
Tel: (212) 637-2723

**AFFIRMATION OF SERVICE**

I, Karyn Leon-Matovick affirm under penalty of perjury pursuant to 28 U.S.C. §1746 the following:

I am employed with FSA in the Office of Michael J. Garcia, United States Attorney for the Southern District of New York, and

That on May 29, 2008 I caused one copy of the Government's Forfeiture Bill of Particulars, dated May 28, 2008, in the case of United States v. Michael Chu, et al., 07 Cr. 1143 (DC), to be delivered by ECF to the registered filing users in this case, and

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
May 29, 2008

  
KARYN LEON-MATOVICK